

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

DEBORAH KINDER, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

MEREDITH CORPORATION, an Iowa
corporation,

Defendant.

Case No. 1:14-cv-11284-TLL-CEB

Hon. Thomas L. Ludington

AGREED MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Deborah Kinder (“Plaintiff”), by and through her counsel, hereby moves the Court to extend the class certification and dispositive motion deadlines in the current Scheduling Order by fourteen (14) days. In support of her Motion, Plaintiff states:

1. On April 15, 2015, and pursuant to the parties’ stipulation, the Court extended the discovery cutoff in this matter to June 28, 2015 and ordered that the deadline for Plaintiff’s Motion for Class Certification be extended to July 26, 2015.
2. On June 23, 2015, Plaintiff completed the depositions of Defendant’s two Rule 30(b)(6) designees. The parties expect to receive the transcripts for those depositions on June 30, 2015.
3. Presently, the parties are also in the process of producing certain remaining documents. The parties have met and conferred on this production and

have agreed that such documents will be produced during the week of June 29, 2015.

4. Likewise, and also by agreement, Plaintiff has noticed and will conduct a third party deposition on June 29, 2015. The parties expect to receive the transcript for this third party deposition on or before July 6, 2015.

5. Because these remaining discovery items (i.e., the above-described deposition transcripts and remaining document production) will impact Plaintiff's upcoming motion for class certification, Plaintiff seeks a 14-day extension to the July 26, 2015 class certification deadline and November 30, 2015 dispositive motion deadline.

6. Plaintiff respectfully submits that good cause and compelling circumstances support the instant request. While discovery disputes have arisen between the parties over the last several months, Plaintiff and Defendant have worked cooperatively to resolve such disputes without Court intervention. Here, too, the parties are facilitating by agreement the production of the few remaining discovery items discussed above, all of which are necessary to present the Court with a full and complete record on class certification and summary judgment.¹

7. The instant motion is filed in good faith and not for purposes of causing undue delay.

¹ To be clear, Plaintiff is not seeking an extension to the discovery period—only an extension of the class certification and dispositive motion deadlines.

8. Plaintiff's counsel conferred with counsel for Defendant on June 26 and 27, 2015. Defendant does not oppose this motion and agrees to the relief requested herein.

WHEREAS, Plaintiff Deborah Kinder respectfully requests that the Court enter an Order extending her deadline to file a motion for class certification and the parties' deadline to file dispositive motions by fourteen (14) days.

Respectfully submitted,

Dated: June 28, 2015

Deborah Kinder, individually and on behalf of all others similarly situated,

By: /s/ Benjamin S. Thomassen
One of Plaintiff's Attorneys

Ari J. Scharg
ascharg@edelson.com
Benjamin S. Thomassen
bthomassen@edelson.com
J. Dominick Larry
nlarry@edelson.com
EDELSON PC
350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

Henry M. Scharg – P28804
hmsattyatlaw@aol.com
LAW OFFICE OF HENRY M. SCHARG
718 Ford Building
Detroit, Michigan 48226
Tel: 248.596.1111
Fax: 248.596.1578

Counsel for Plaintiff Kinder and the putative class

CERTIFICATE OF SERVICE

I, Benjamin S. Thomassen, an attorney, hereby certify that on June 28, 2015, I served the above and foregoing ***Agreed Motion to Modify Scheduling Order*** by causing true and accurate copies of such papers to be sent to all counsel of record in this action via the Court's CM/ECF system.

/s/ Benjamin S. Thomassen